

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF NORTHERN KENTUCKY	)	
WATER DISTRICT FOR APPROVAL OF THE	)	
RIPPLE CREEK WATER MAIN REPLACEMENT	)	CASE NO. 2013-00390
AND EXTENSION, ISSUANCE OF A	)	
CERTIFICATE OF CONVENIENCE AND	)	
NECESSITY AND APPROVAL OF FINANCING	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO NORTHERN KENTUCKY WATER DISTRICT

Pursuant to 807 KAR 5:001, Northern Kentucky Water District ("Northern District") shall file with the Commission no later than December 23, 2013, shall file a copy in electronic medium and two paper copies of the following information. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry. Northern District shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Northern District fails or refuses to furnish all or part of the requested

information, Northern District shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. At Paragraph No. 5 of its Application, Northern District refers to “projected long term growth that is anticipated with the construction of the new Eastern Regional Sanitation Plant.”

a. State the number of anticipated new customers and the time period during which these new customers will appear.

b. Provide all studies upon which Northern District relies for its expectation of long-term growth.

c. State whether the reference to “Eastern Regional Sanitation Plant” refers to Sanitation District No. 1 of Northern Kentucky’s Eastern Regional Water Reclamation Facility.”

d. State the expected completion date of the Eastern Regional Sanitation Plant. If construction has been completed, provide the completion date.

2. At Paragraph No. 5 of its Application, Northern District refers to a moratorium on construction in the area in which the proposed construction is planned.

a. Describe the area that is subject to the moratorium.

b. State the date on which moratorium was imposed.

c. Identify the agency which imposed the moratorium.

d. State the date that the moratorium is expected to be lifted. If the moratorium has been lifted, state the date on which it was lifted.

3. Provide all projections regarding water usage in the area subject to the moratorium and the number of customers anticipated to be added upon the lifting of the moratorium. Describe the additional demand that these additional customers are expected to produce.

4. State the expected average daily and peak water usage of the Eastern Regional Sanitation Plant.

5. At Exhibit D of its Application, Northern District states that the proposed project has "a potential of 3 new customers to be added."

a. State whether each of these customers has either executed a contract for water service or has otherwise indicated that it will apply for water service upon completion of the proposed construction. If no contract has been executed, state when Northern District expects to add the customer(s).

b. State the expected monthly water usage of each of these customers.

c. State whether Northern District anticipates additional customers beyond these three customers at some future date. If Northern District anticipates additional customers, state the number of customers, their anticipated monthly water usage, and the anticipated date that each will request service.

d. State the estimated total water demand resulting from the water main extension.

6. At Exhibit A of the Application, Northern District describes the proposed project as “partial water main replacement project and a water main extension plus hydraulic improvement.”

a. State the diameter, length, and composition of the water main that Northern District proposes to replace.

b. State the length of the proposed main that constitutes the “water main extension.”

c. State the size, length, and composition of the water main that is being replaced.

d. State whether the water main that is being replaced will be removed. If the replaced water main is not being removed, state whether it will continue in service. Explain.

e. State the age of the water main that being replaced.

7. If the replaced water main is being removed or otherwise taken out of service, describe how Northern District will reflect this action for accounting purposes.

8. Explain how Northern District determined that the proposed water main should be 24 inches in diameter.

9. Describe the hydraulic problems or concerns that require the proposed construction.

10. State whether Northern District has received any complaints regarding water service in the area that Northern District attributes directly to the size of the existing water main that it proposes to replace. If Northern District has received such

complaints, provide a copy of each complaint and describe Northern District's response to each complaint.

11. Describe the hydraulic benefits or improvements that the proposed construction will produce.



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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED: DEC 16 2013

cc: Parties of Record

Case No. 2013-00390

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